

	LCUG Proposed Functions/Measurements	Bell Atlantic Committed Measurements	Comments
	INTERCONNECT/UNBUNDLED ELEMENTS AND COMBOS (IUE)		
IUE-1	Availability of Network Elements <ul style="list-style-type: none"> Availability of Network Elements 	19. % Common Trunk Blocking 20. % Dedicated Final Trunk Blocking	<p>The metrics in this category are ambiguous. The ability to measure many of the illustrative examples on carrier specific basis would require sampling techniques similar to those discussed in NP-1.</p> <p>Bell Atlantic will report the % of trunk groups exceeding blocking design standards. This is the same manner in which Bell Atlantic measures and monitors its own trunk performance and makes decisions on growth requirements and the need to order additional interconnection trunks from CLECs.</p>
IUE-2	Performance of Network Elements <ul style="list-style-type: none"> Timeliness of Element Performance 		<p>This metric is also somewhat ambiguous. However, because data bases (such as 800 and LIDB) are common, there is no way for the data base to discriminate based on the user. Accordingly, this measure is unnecessary.</p>

Comparison of LCUG "Reporting Dimensions" with Bell Atlantic Committed Report Detail

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
PRE-ORDERING (PO)			
Response Time	Proposed Pre-Order Query Types: <ul style="list-style-type: none"> • Due Date Reservation • Feature Function Availability • Facility Availability • Street Address Availability • Service Availability Information • Appointment Scheduling • Customer Service Record • Telephone Number • Rejected of [sic] Failed Queries 	Transaction Types Measured: <ul style="list-style-type: none"> • Customer Service Record • Due Date Availability, Address Validation, Feature Function Availability, Telephone Number Selection and Reservation 	Bell Atlantic will measure response time for CLECs and for its own retail representatives on all but two of LCUG's proposed query types. ("Facility Availability" is not available to Bell Atlantic representatives or to CLEC representatives through pre-order OSS. Bell Atlantic is not sure what kind of a transaction "Rejected of Failed Queries" is. Appointment Scheduling and Due Date Reservation are the same; Feature Function Availability and Service Availability are the same.)
ORDERING & PROVISIONING (OP)			
Order Completion Intervals	Proposed Service Groupings: <ul style="list-style-type: none"> • Resold Residence POTS • Resold Business POTS • Resold Residence ISDN • Resold Business ISDN • Resold Centrex/Centrex like • Resold PBX trunks • Resold Channelized T1.5 Service • Other Resold Services • UNE Platform (DS0, local switch & transport • UNE Channelized DS1 (DS1 loop & multiplexing • Unbundled DS0 loop • Unbundled DS1 loop • Other unbundled loop • Unbundled Switch • Other UNEs 	Product Categories Measured: <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) <ul style="list-style-type: none"> 5 lines or less 6 - 9 lines 10 lines or more • UNE (Specials) <ul style="list-style-type: none"> 5 lines or less 6 - 9 lines 10 lines or more • Resale (POTS) <ul style="list-style-type: none"> 5 lines or less 6 - 9 lines 10 lines or more • Resale (Specials) <ul style="list-style-type: none"> 5 lines or less 6 - 9 lines 10 lines or more 	Bell Atlantic does not maintain product specific data in the provisioning environment. Bell Atlantic will report by product categories reflecting the possible entry strategies of CLECs and the actual operation of Bell Atlantic's business – the way Bell Atlantic actually assigns and performs work for its own customers, as well as for CLECs.

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
Order Completion Intervals	Proposed Activity Groupings: <ul style="list-style-type: none"> • New Service Installations • Service Migrations without changes • Service Migrations with changes • Local Number Porting • Move and change activities • Feature changes • Service Disconnects 	Activity Types Measured: <ul style="list-style-type: none"> • Dispatch • No dispatch 	Bell Atlantic does not track orders for itself or for CLECs at the level of detail proposed by LCUG. In its own operations, Bell Atlantic distinguishes between dispatched and non-dispatched orders for assignment and tracking. Reporting these activity types separately avoids masking the performance of either type of work through averaging with the other.
Order Accuracy	Proposed Service Groupings: <ul style="list-style-type: none"> • Resold Residence POTS • Resold Business POTS • Resold Residence ISDN • Resold Business ISDN • Resold Centrex/Centrex like • Resold PBX trunks • Resold Channelized T1.5 Service • Other Resold Services • UNE Platform (DS0, local switch & transport) • UNE Channelized DS1 (DS1 loop & multiplexing) • Unbundled DS0 loop • Unbundled DS1 loop • Other unbundled loop • Unbundled Switch • Other UNEs 	Product Categories Measured: <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) • UNE (Specials) • Resale (POTS) • Resale (Specials) 	See Exhibit A, OP-3. Bell Atlantic will measure % Installation Troubles within 30 days in each of the listed product categories. Bell Atlantic will also measure % Reject and % Flow Through.

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
Order Status	<p>Proposed Service Groupings:</p> <ul style="list-style-type: none"> • Resold Residence POTS • Resold Business POTS • Resold Residence ISDN • Resold Business ISDN • Resold Centrex/Centrex like • Resold PBX trunks • Resold Channelized T1.5 Service • Other Resold Services • UNE Platform (DS0, local switch & transport) • UNE Channelized DS1 (DS1 loop & multiplexing) • Unbundled DS0 loop • Unbundled DS1 loop • Other unbundled loop • Unbundled Switch • Other UNEs 	<p>Order Types Measured:</p> <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) • UNE (Specials) • Resale (POTS) • Resale (Specials) <p>For FOC/Reject Timeliness, measures for Interconnection Trunks are further broken down as follows:</p> <ul style="list-style-type: none"> - Average response time - % > 10 days <p>and measures for UNE (POTS), UNE (Specials), Resale (POTS), Resale (Specials) are further broken down as follows:</p> <ul style="list-style-type: none"> - < 10 lines - ≥ 10 lines - Mechanized orders - Non-mechanized orders 	<p>Bell Atlantic does not track orders for itself or for CLECs at the level of detail proposed by LCUG. Bell Atlantic will report by order types reflecting the possible entry strategies of CLECs, and by line size breakdown reflecting the way Bell Atlantic actually plans and performs work both for itself and for CLECs. As a result, reporting order confirmation and reject timeliness for orders of fewer than 10 lines and separately for orders of 10 lines or more provides a more accurate measure of Bell Atlantic's performance than reports by service groupings that do not reflect the scheduling or work effort required.</p>

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
Held Orders	<p>Proposed Service Groupings:</p> <ul style="list-style-type: none"> • Resold Residence POTS • Resold Business POTS • Resold Residence ISDN • Resold Business ISDN • Resold Centrex/Centrex like • Resold PBX trunks • Resold Channelized T1.5 Service • Other Resold Services • UNE Platform (DS0, local switch & transport • UNE Channelized DS1 (DS1 loop & multiplexing • Unbundled DS0 loop • Unbundled DS1 loop • Other unbundled loop • Unbundled Switch • Other UNEs 	<p>Product Categories Measured:</p> <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) • UNE (Specials) • Resale (POTS) • Resale (Specials) 	<p>Bell Atlantic does not have the ability to measure held orders, as defined by LCUG, for itself or for CLECs. However, Bell Atlantic will report Average Offered Interval and Average Completed Interval for the listed Product Categories, which will provide "assurances that the average period that CLEC orders are held, due to a delayed completion, is no worse for the CLEC when compared to ILEC orders." (pp. 9, 30)</p>
Held Orders	<p>Proposed Reason for Hold:</p> <ul style="list-style-type: none"> • No Facilities • No Equipment • Workload • Other 	<p>Held Orders Measured:</p> <ul style="list-style-type: none"> • Facility Missed Orders 	<p>Bell Atlantic holds orders for facilities. Other missed orders are rescheduled as soon as possible. Bell Atlantic will report facility misses.</p>

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
MAINTENANCE AND REPAIR (MR)			
Time To Restore Frequency of Repeat Troubles Frequency of Trouble Reports Estimated Time to Restore Met	Proposed Service Groupings: <ul style="list-style-type: none"> • Resold Residence POTS • Resold Business POTS • Resold Residence ISDN • Resold Business ISDN • Resold Centrex/Centrex like • Resold PBX trunks • Resold Channelized T1.5 Service • Other Resold Services • UNE Platform (DS0, local switch & transport • UNE Channelized DS1 (DS1 loop & multiplexing • Unbundled DS0 loop • Unbundled DS1 loop • Other unbundled loop • Unbundled Switch • Other UNEs 	Product Categories Measured: <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) • UNE (Specials) • Resale (POTS) • Resale (Specials) 	Bell Atlantic does not track and measure product specific data in the maintenance environment. Bell Atlantic will report by product categories reflecting the possible entry strategies of CLECs and the actual operation of Bell Atlantic's business – the way Bell Atlantic actually assigns and handles repair work for its own customers, as well as for CLECs.
Time To Restore Frequency of Repeat Troubles Frequency of Trouble Reports Estimated Time to Restore Met	Proposed Disposition and Cause dimensions: <ul style="list-style-type: none"> • Out of Service No Dispatch • Out of Service with Dispatch • Hold open for monitoring • Customer Premises Equipment trouble including Inside wire • No Trouble Found • Central Office Equipment • Interoffice Facilities • Loop/Access Line • All other troubles • No access 	Activity Types Measured: <ul style="list-style-type: none"> • Dispatch • No dispatch In addition, the Trouble Report Rate includes the following dispositions: <ul style="list-style-type: none"> • Central office troubles • Loop/access line troubles 	Interoffice facilities are not uniquely tracked, but would be charged to a central office code or loop trouble as appropriate. "No access" indicators will be included on the status of the trouble given to carriers for each trouble. As noted in Exhibit A, Bell Atlantic also reports % Out of Service > 24 Hours for each of the Product Categories listed above.

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
GENERAL (GE)			
Systems Availability	Requested Dimensions: <ul style="list-style-type: none"> Interface type for each functional area Business Period (8:00 a.m. to 8:00 p.m.; 8:00 p.m. to 8:00 a.m.; weekends; holidays) 	Bell Atlantic will report availability of DCAS (North) and ECG (South) without regard to time of day/ business day vs. holiday	Bell Atlantic will report gateway/interface availability. If an OSS is down, it will be down for all users. Any difference in availability for CLECs would result from the gateway/interface being down.
Center Responsive-ness	Requested Dimensions: <ul style="list-style-type: none"> CLEC Centers - Resale CLEC Centers - UNE CLEC Centers Repair BA Retail Residence Centers BA Retail Business Centers BA Retail Repair Centers Other BA Retail Centers 	Bell Atlantic will report OSS Interface Availability and Response Time	Transactions for CLECs are electronic in nature. The call centers handling CLECs are designed as "fall-out" centers, handling exceptions and performing "help" functions. Consequently these centers do not handle high volumes of calls and are not analogous to the retail center handling calls for Bell Atlantic end users.
BILLING (BI)			
Timeliness of Billing Record Delivery	Requested Dimensions: <ul style="list-style-type: none"> End User Access User Alternately Billed Wholesale bill Unbundled Element 	End user and access records are included in the Daily Usage Feed. Unbundled Elements and Resale services are included on the Carrier bill.	Bell Atlantic's central office switches collect and record usage data as calls are processed. Bell Atlantic endeavors to capture all usage on the Daily Usage File in a timely manner; it makes no sense to measure subcategories of usage if a CLEC has requested a Daily Usage File. Carriers get one bill that includes both unbundled elements and resale services. As a result, there is no reason to measure these categories separately.
Accuracy of Billing Records	Requested Dimensions: <ul style="list-style-type: none"> End User Access User Alternately Billed Wholesale bill Unbundled Element 		Bell Atlantic assumes that the invoice and usage tapes are accurate. Bell Atlantic has no measure of bill accuracy or usage accuracy for its own end user bills. If it had the ability to measure this, it would fix the invoice before delivery. Only the CLEC can measure this and report it to Bell Atlantic.

Function	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
OPERATOR SERVICES AND DIRECTORY ASSISTANCE (OS, DA)			
Speed To Answer	Requested Dimensions: <ul style="list-style-type: none"> • Operator Services in Aggregate • Directory Assistance • Processing Method (human versus machine processes) 	See Exhibit A, OS/DA - 1	Bell Atlantic does not have the ability to measure Operator Services answer performance separately for human and machine processes, nor does it have the ability to measure separately the performance for individual CLECs.
NETWORK PERFORMANCE (NP)			
Network Performance Parity	Proposed Transmission Quality Measures: <ul style="list-style-type: none"> • Subscriber Loop Loss • Signal to Noise Ratio • Idle Channel Circuit Noise • Loop-Circuit Balance • Circuit Notched Noise • Attenuation Distortion 	Service Quality Measured: <ul style="list-style-type: none"> • Customer Trouble Report Rate • % Repeat Trouble Reports within 30 Days These measures will be reported for: <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) • UNE (Specials) • Resale (POTS) • Resale (Specials) 	<p>LCUG's proposed transmission quality measures are not routinely monitored or captured in any way for Bell Atlantic for itself. Loops are tested upon installation and during troubles. The results of these tests are not maintained in a data base that could report such performance. Moreover, as DOJ notes, "[c]urrent network design, architecture, and operating systems mak[e] switching and transmission performance measure discrimination highly unlikely. Unless specifically reprogrammed to do so, the network is not likely to recognize the carrier 'owner' of a call processing through it." Friduss Aff. at 25.</p> <p>Bell Atlantic will measure Trouble Report Rate and % Repeat Trouble Reports within 30 Days. See Exhibit A, NP-1.</p>
Network Performance Parity	Proposed Speed of Connection Measures: <ul style="list-style-type: none"> • Dial Tone Delay • Post Dial Delay • Call Completion/Delivery Rate 	Network Performance Measured: <ul style="list-style-type: none"> • % Common Trunk Blocking • % Dedicated Final Trunk Blocking 	<p>Dial Tone Delay and call completion performance is measured by each switch for the switch as a whole. There is no ability to separately measure this for CLEC end users apart from Bell Atlantic end users. See Friduss Aff. at 25. Performance may vary by switch type. See Exhibit A, NP-1.</p>

	LCUG Proposed "Reporting Dimensions"	Bell Atlantic Committed Report Detail	Comments
Network Performance Parity	<p>Proposed Reliability Measures:</p> <ul style="list-style-type: none"> • Network Incidents affecting > 5000 Blocked Calls • Network Incidents affecting > 100,000 Blocked calls 	<p>Service Quality Measured:</p> <ul style="list-style-type: none"> • Customer Trouble Report Rate • % Repeat Trouble Reports within 30 Days • % Out of Service > 24 Hours <p>These measures will be reported for:</p> <ul style="list-style-type: none"> • Interconnection Trunks • UNE (POTS) • UNE (Specials) • Resale (POTS) • Resale (Specials) 	Network Incidents are currently reported to the FCC in accordance with Commission rules. Reporting parameters differ from LCUG's proposal. <i>See Exhibit A, NP-1.</i>
INTERCONNECT/UNBUNDLED ELEMENTS AND COMBOS (IUE)			
Availability of Network Elements	<p>Proposed Reporting Dimensions:</p> <ul style="list-style-type: none"> • By unique UNE or UNE combinations requested by the CLECs 	<p>Network Performance Measured:</p> <ul style="list-style-type: none"> • % Common Trunk Blocking • % Dedicated Final Trunk Blocking 	<i>See Exhibit A, IUE-1</i>
Performance of Network Elements	<p>Proposed Reporting Dimensions:</p> <ul style="list-style-type: none"> • By unique UNE or UNE combinations requested by the CLECs 		<i>See Exhibit A, IUE-2</i>